

## **REMARKS**

Claims 1-7 and 21-28 were pending. Claims 1, 5, 21, 26 and 27 have been amended. Accordingly, claims 1-7 and 21-28 remain pending.

## **Election**

In furtherance of the phone interview on April 2, 2004, Applicant hereby affirms election of claims 1-7 and 21-28 ("Group I") for prosecution in this application.

## **Claim Rejections**

Claims 1-7 and 21-28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application No. 2002/0169556 (hereinafter "Sokolov") in view of U.S. Patent No. 6,128,717 (hereinafter "Harrison"). Applicant respectfully traverses these rejections and requests reconsideration.

Applicant submits that each of the recited claims include features neither taught nor suggested by the cited art. For example, claim 1 recites a method for resolving a storage object's absolute location within a first storage environment to grant access to the storage object which includes:

"determining an initial communications stack level associated with the storage reference;  
iterating through one or more additional communications stack levels beginning with the initial stack level in response to determining the storage reference is not an absolute reference; and  
translating the storage reference through each iteration into one or more relative extents until one or more absolute extents are obtained, wherein the one or more absolute extents comprise the storage object's absolute location within the first storage environment."

In the present Office Action, Sokolov is cited as teaching various features concerning the recited stack. However, the stack recited in the present claims and the

stack taught in Sokolov are not the same. Applicant has amended the claims to clarify that it is a *communications* stack and *communications* stack levels are being recited. In contrast, the stack taught by Sokolov is a simple data structure. As may be appreciated by those skilled the art, a communications stack as recited is unrelated to the stack taught by Sokolov. Applicant believes the clarifying amendment serves to clearly distinguish from the cited art.

In view of the above, it is apparent that Sokolov does not teach any of the recited features concerning a communications stack. For example, Sokolov does not teach or suggest “determining an initial communications stack level associated with the storage reference.” In addition, Sokolov does not teach “iterating through one or more additional communications stack levels...” It is further noted that the portion of Sokolov offered as teaching this feature not only does not teach anything concerning communications stack levels, but does not teach iterating either. Rather, the cited portion of Sokolov (Fig. 3 and description) merely teaches a flow chart which includes a single decision point (item 306). However, there is not teaching or suggestion of an iterative process.

Still further, neither Sokolov nor Harrison teaches or suggests “iterating through one or more additional communications stack levels beginning with the initial stack level in response to determining the storage reference is not an absolute reference.” Harrison simply teaches a command format including an extent field (Fig. 6) and also merely teaches that:

“Another more specific object of the present invention is to provide a plurality of known SAPI descriptors and select a particular descriptor for a data object which enables a data storage device, such as a disk drive, to map from a host-supplied primary LBA space to a unique logical object address (LOA) space tailored to characteristics of the particular data storage device in a manner which is transparent to the host computing environment in which the disk drive is situated.” (col. 6, lines 1-8).

However, none of these teachings of Harrison teach or suggest the features as recited above.

Finally, Sokolov does not teach “translating the storage reference through each iteration . . .” In contrast, Sokolov teaches optionally translating a Java command depending upon whether or not the command is likely to place a reference on an execution stack and a change of flow control is involved. (Sokolov, [0048]). Further, as no iteration is taught or suggested by Sokolov, there is no teaching concerning translation through each iteration.

In view of the above, Applicant submits the recited claims are patentably distinguishable over the cited art, either singly or in combination. Accordingly, claim 1 is believed patentable. Further, because claim 21 includes features similar to that of claim 1, claim 21 is believed patentable as well.

**CONCLUSION**

Applicant submits the application is in condition for allowance, and an early notice to that effect is requested.


If any extensions of time (under 37 C.F.R. § 1.136) are necessary to prevent the above referenced application(s) from becoming abandoned, Applicant(s) hereby petition for such extensions. If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5760-17100/RDR.

Also enclosed herewith are the following items:

☒ Return Receipt Postcard

☐ Other:

Respectfully submitted,

  
\_\_\_\_\_  
Rory D. Rankin  
Reg. No. 47,884  
ATTORNEY FOR APPLICANT(S)

Meyertons, Hood, Kivlin,  
Kowert, & Goetzel, P.C.  
P.O. Box 398  
Austin, TX 78767-0398  
Phone: (512) 853-8800

Date: 5/10/04